

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Public Advocates Office's
Investigation of Communications Pertaining to
the Wildfire Mitigation Plan of Pacific Gas and
Electric Company

Not in a Proceeding

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
RESPONSE TO PUBLIC ADVOCATES OFFICE'S
MOTION TO COMPEL AND REQUEST FOR SANCTIONS**

CHARLES MIDDLEKAUFF

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (650) 766-9147
E-Mail: Charles.Middlekauff@pge.com

Dated: December 10, 2021

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

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Pursuant to California Public Utilities Commission (Commission) Rule of Practice and Procedure 11.3(b), Pacific Gas and Electric Company (PG&E) respectfully submits this response to the Public Advocates Office's (Cal Advocates) Motion to Compel submitted on November 30, 2021 (Motion).

In general, PG&E works diligently to timely provide all of the information requested by Cal Advocates, the Commission, and parties. For example, in the context of the Wildfire Mitigation Plan (WMP) proceeding (Rulemaking (R.) 18-10-007), in 2021 alone PG&E responded to more than 23 sets of data requests from Cal Advocates that totaled more than 820 questions (counting subparts). In response to Cal Advocates' WMP-related discovery, PG&E provided hundreds of pages of responses and over 150 attachments. In addition to the requests in R.18-10-007, in 2021 PG&E has responded to more than 20 non-case data requests from Cal Advocates that included (with subparts) more than 270 questions with hundreds of pages of responses and attachments. In short, with regard to the WMP process and non-case discovery, Cal Advocates' data requests have been extensive and we have made every effort to accommodate these requests and provide timely and substantive responses.

There are times, however, when discovery goes beyond the boundaries of what is relevant to a specific matter or is outside the boundaries of an agency's authority. The scope of discovery is not limitless, nor should it be. At those times, when discovery is outside of the boundaries of relevance or statutory authority, it is entirely appropriate for a utility receiving these requests to object. As Cal Advocates' counsel stated during the meet and confer process at

issue here, the Commission's rules do not indicate that a party is acting in bad faith "if after the meet and confer, the parties take a position that the other party is not amenable to."¹

In this case, Cal Advocates propounded five discovery requests seeking communications between PG&E and the Office of Energy Infrastructure Safety (Energy Safety) and communications between PG&E and Commissioners and/or their offices. Although the Motion does not make this clear, PG&E has fully responded to the requests regarding communications with Commissioners and/or their offices. PG&E has only objected to the portion of Cal Advocates' data requests that seek communications with Energy Safety. During meet and confer, Cal Advocates failed to explain the relevance of this discovery or how its requests are consistent with Cal Advocates' statutory mission and duties. Even in its Motion, Cal Advocates fails to clearly articulate why information concerning communications with Energy Safety is relevant or needed. At their core, the data requests at issue here appear to be an effort by Cal Advocates to monitor and exercise oversight over Energy Safety. While Cal Advocates has broad statutory authority at the Commission, the Legislature certainly did not intend Cal Advocates to exercise an oversight role over Energy Safety – a separate and co-equal regulatory agency. Because Cal Advocates' requests are well beyond the scope of its statutory authority and duties, PG&E's objections are entirely appropriate.

Cal Advocates' Motion also asserts bad faith and requests sanctions. The Motion's assertion of bad faith is also not well founded. As even a cursory review of the facts demonstrates, PG&E has been responsive to Cal Advocates' requests and PG&E meaningfully engaged in the meet and confer process. As Cal Advocates' counsel explained, the fact that there is a disagreement between the parties does not indicate bad faith. In addition, there are some factual omissions in Cal Advocates' Motion that the Commission should consider in reviewing the Motion. These issues are described in more detail below.

To be clear, PG&E respects the important role that Cal Advocates' plays in the regulatory process and its need for relevant information to fulfill that role. In that regard, we have worked

¹ Motion, Exhibit H at p. 1.

diligently to respond to Cal Advocates' requests. There are, however, boundaries to Cal Advocates' role and scope of authority. Here, because those boundaries have been crossed, it is entirely appropriate for PG&E to object to Cal Advocates' data requests.

I. BACKGROUND

Before addressing the factual and legal errors in Cal Advocates' Motion, it is important to put the requests in context. In this section, we provide background concerning PG&E's 2021 WMP, the discovery requests at issue in this Motion, the subsequent meet and confer and process, and the information provided by PG&E in response to Cal Advocates' requests.

A. Energy Safety's Approval of PG&E's 2021 WMP

Electrical corporations under the Commission's jurisdiction are required by statute to submit annual Wildfire Mitigation Plans or "WMPs."² The WMP outlines an electrical corporation's plans to address wildfire risk in its service territory during the calendar year. WMPs are reviewed by Energy Safety. Energy Safety was a part of the Commission (referred to as the Wildfire Safety Division) until July 1, 2021, at which point it became a separate regulatory agency under the California Natural Resources Agency. Energy Safety has statutory responsibility for review and approval of an electrical corporation's WMP.³ The Commission's responsibility is to ratify the action of Energy Safety.⁴

PG&E submitted its 2021 WMP on February 5, 2021, after which parties engaged in extensive and expedited discovery. On March 29, 2021, Cal Advocates submitted its comments on PG&E's 2021 WMP arguing that the 2021 WMP was deficient and should be rejected.⁵ On June 6, 2021, PG&E provided a revised version of its 2021 WMP consistent with direction from Energy Safety. Cal Advocates again filed comments and again suggested that PG&E's 2021 WMP was deficient.

² Cal. Pub. Util. Code § 8386(b).

³ Cal. Pub. Util. Code § 8386.3(a).

⁴ *Id.*

⁵ *Comments of the Public Advocates Office on the 2021 Wildfire Mitigation Plan Update of Pacific Gas and Electric Company* at pp. 6-12.

On August 9, 2021, the Commission issued Draft Resolution WSD-021 addressing PG&E's 2021 WMP. The Draft Resolution included Energy Safety's draft Action Statement approving PG&E's 2021 WMP and the Commission's ratification of Energy Safety's decision. Energy Safety also separately issued its draft Action Statement. On August 30, Cal Advocates submitted comments on Energy Safety's draft Action Statement as well as Draft Resolution WSD-021. Cal Advocates referenced its earlier position that PG&E's 2021 WMP should be denied and then addressed a number of issues specifically related to the draft Action Statement.⁶

On September 22, 2021, Energy Safety issued its Final Action Statement approving PG&E's 2021 WMP. Energy Safety acknowledged many of the comments made by Cal Advocates but determined that PG&E had demonstrated "an improved understanding of the underlying risks it faces, a more targeted approach to addressing those risks, and a foundational change in its organization structure and systems, including data governance, that will better position it to improve over time."⁷ Energy Safety also identified areas of key improvement for PG&E going forward in both 2021 and in future WMPs. On October 25, 2021, the Commission issued Resolution WSD-021 ratifying Energy Safety's approval.

B. Cal Advocates' Discovery Requests

On September 30, 2021, immediately after Energy Safety's approval of PG&E's 2021 WMP, Cal Advocates propounded the discovery requests at issue in this motion.⁸ The discovery requests include five questions falling into two categories.

First, Cal Advocates seeks information regarding "wildfire safety or mitigation efforts" communications between PG&E and Energy Safety since July 1, 2021. Cal Advocates broadly defined "wildfire safety or mitigation efforts" to include Draft Resolution WSD-021, all subjects that fall under R.18-10-007, PG&E's implementation of or changes to initiatives described in its

⁶ *Public Advocates Office's Comments on Draft Resolution WSD-021 and the Office of Energy Infrastructure Safety's Draft Action Statement on Pacific Gas and Electric Company's 2021 Wildfire Mitigation Plan (WMP) Update Pursuant to Public Utilities Code Section 8386*, submitted August 30, 2021 at p. 4.

⁷ Final Action Statement issued by Energy Safety on September 22, 2021 at p. 3.

⁸ See Motion, Exhibit A.

Wildfire Mitigation Plan, WMP compliance, executive compensation, safety certification, and public safety power shut offs.⁹ The requests seek: (1) a list of all meetings and presentations (Question 1); (2) meeting materials and presentations (Question 3); and (3) follow-up data requests and responses from any meetings or presentations (Question 4).

Second, Cal Advocates requested identical information for meetings with any Commissioner and/or their staff (Questions 2, 3, and 5).

PG&E submitted objections to these requests on October 14, 2021.¹⁰

C. The Meet and Confer Process

On October 21, 2021, a week after PG&E submitted its objections, Cal Advocates initiated the meet and confer process.¹¹ A brief chronology of the meet and confer process is provided below:

Date	Description	Exhibit¹²
9/30/2021	Data requests propounded	A
10/14/2021	PG&E's objections served	B
10/21/2021	Cal Advocates initiates meet and confer and proposes a call on 10/21 or 10/25	E
10/22/2021	PG&E responds to Cal Advocates' meet and confer request and proposes scheduling the call for 10/25 consistent with Cal Advocates' proposal	F
10/25/2021	Meet and confer occurs and subsequently Cal Advocates proposes to limit the scope of discovery, and requests a response from PG&E in less than 24 hours	F
10/25/2021	PG&E responds to Cal Advocates' proposal requesting clarifications and at least 24 hours to respond after the clarifications are received	G
10/26/2021	Cal Advocates responds to PG&E indicating that its counsel is available to provide further clarification and agreeing to further time before filing its motion to compel	H

⁹ Motion, Exhibit A at p. 4.

¹⁰ Motion, Exhibit B. Cal Advocates does not dispute that PG&E's objections were timely.

¹¹ Motion, Exhibit C.

¹² Exhibit references are to exhibits included with the Motion.

Date	Description	Exhibit¹²
10/26/2021	Cal Advocates further agrees to “soften the deadline in its previous email” and agreeing that after clarification is provided, PG&E has 24 hours to provide a response to any Cal Advocates’ proposal	I
10/27/2021	Cal Advocates and PG&E conduct further meet and confer regarding the discovery requests	J
10/29/2021	Cal Advocates requests that PG&E indicate by 11/2 whether PG&E will agree with Cal Advocate’s proposal	J
10/31/2021	PG&E responds to the statements made in Cal Advocates’ 10/29 communication with clarifications and corrections to the statements made	Not included ¹³
11/2/2021	PG&E responds to Cal Advocates’ proposal in the time requested by Cal Advocates	K
11/5/2021	PG&E provides revised discovery consistent with its response to Cal Advocate’s proposal	L
11/12/2021	PG&E provides additional revised discovery consistent with its response to Cal Advocate’s proposal	M
11/19/2021	Cal Advocates propound additional discovery consistent with its proposal	N
11/24/2021	Cal Advocates agrees to an extension for responding to its additional discovery	Not included ¹⁴
12/03/2021	PG&E provides timely response to Cal Advocates’ additional discovery	Provided after Motion

As a result of the meet and confer process, Cal Advocates and PG&E were able to reach some agreements.

For the data requests seeking information on meetings with Commissioners and/or their staffs, PG&E agreed to provide specific materials requested by Cal Advocates on November 5, 2021 (three days before they were requested by Cal Advocates) and to provide a list of meetings on November 12, 2021. PG&E also agreed to provide further information

¹³ PG&E is including this communication as Attachment 1 to this response so that the Commission has a complete record of the communications during the meet and confer process.

¹⁴ PG&E is including this communication as Attachment 2 to this response so that the Commission has a complete record of the communications during the meet and confer process.

regarding meetings with Commissioners and/or their staffs if requested by Cal Advocates.¹⁵

For the requests related to Energy Safety, PG&E continued to maintain its objections and explained the basis for these objections.¹⁶

D. PG&E Fully Responded To Requests Concerning Communications with Commissioners and Their Offices

As agreed during the meet and confer process, on November 5, 2021, PG&E provided to Cal Advocates the materials used in an October 8th meeting with Commission Guzman Aceves' office.¹⁷ On November 12, PG&E provided a list of meetings that it had with Commissioners and/or their staffs.¹⁸

The parties also agreed in meet and confer that Cal Advocates could ask follow-up requests for information regarding meetings with Commissioners and/or their offices.¹⁹ Consistent with this agreement, Cal Advocates submitted a follow-up request on November 19, 2021.²⁰ Although Cal Advocates did not include this information in its Motion, on November 24, 2021, Cal Advocates agreed to an extension for this request to December 3, 2021.²¹ PG&E provided the requested information on December 3, 2021.

In short, PG&E and Cal Advocates reached agreement on the information requested for meetings with Commissioners and/or their offices and PG&E has provided this information in a timely manner, and in some cases earlier than requested by Cal Advocates. Thus, it appears that the only dispute at issue here concerns communications with Energy Safety and related documents.

¹⁵ Motion, Exhibit K.

¹⁶ Motion, Exhibit K.

¹⁷ Motion, Exhibit L.

¹⁸ Motion, Exhibit M.

¹⁹ Motion, Exhibit K.

²⁰ Motion, Attachment N.

²¹ See Attachment 2

II. CAL ADVOCATES' DISCOVERY REQUESTS ARE OUTSIDE THE SCOPE OF ITS STATUTORY RESPONSIBILITIES

A. The Scope of Cal Advocates Authority

While Cal Advocates has broad statutory authority to conduct discovery, that authority is not unlimited. Cal Advocates' goal and mission is to "obtain the lowest possible rate for service consistent with safe and reliable levels."²² Cal Advocates may further that goal by compelling "the production or disclosure of any information it deems necessary to perform its duties from any entity regulated by the commission"²³ As the statutory language makes clear, the Legislature very specifically defined the scope of Cal Advocates' authority to compel the production of materials "necessary to perform its duties." If the Legislature had intended Cal Advocates to have unfettered discovery authority, the words "necessary to perform its duties" would arguably not have been included in Section 309.5(e). By including this language, the Legislature made clear that Cal Advocates' authority to compel discovery is tied to its duties described in Section 309.5(a). And while Section 309.5(e) provides that the authority to compel applies for information Cal Advocates "deems" necessary to perform its duties, the word "deems" was certainly not intended to obviate the rest of the statutory language by giving Cal Advocates *carte blanche* to determine what it deems necessary. There must be some objective connection between the information requested and Cal Advocates' duties.

The Commission decision cited by Cal Advocates in its Motion as support for its assertion of broad discovery authority (*i.e.*, Decision ("D.") 01-08-062) was addressing different issues than are presented here.²⁴ In that case, the issues were whether Cal Advocates could conduct discovery outside the context of a formal proceeding and whether such discovery constituted a second audit.²⁵ These issues are not the subject of this Motion. More importantly, although the Commission recognized Cal Advocates' statutory authority to conduct discovery in D.01-08-062, it also noted that Cal Advocates' requests for information must be "related to their

²² Cal. Pub. Util. Code § 309.5(a).

²³ Cal. Pub. Util. Code § 309.5(e).

²⁴ Motion at p. 6, n. 33 and p. 11, n. 50.

²⁵ D.01-08-062, p. 4.

scope of work on behalf of the Commission and the people of the state of California.”²⁶ In other words, the Commission has recognized, as has the Legislature, that Cal Advocates’ authority to conduct discovery is not unlimited, but instead must be related to Cal Advocates’ statutory purpose and goal.

B. Cal Advocates Has Failed To Explain The Relevance of its Requests to Its Statutory Duties

This framework for Cal Advocates’ discovery authority now leads us to the specific requests at issue here. In its objections and during meet and confer, PG&E has maintained that requests regarding communications between PG&E and Energy Safety are not relevant or related to Cal Advocates’ statutory duties. The Motion offers several differing explanations as to why Cal Advocates needs information regarding communications between PG&E and Energy Safety from July 1, 2021 to September 30, 2021.²⁷ Specifically, the Motion states that the discovery is needed to: (1) review Energy Safety’s approval of PG&E’s 2021 WMP; (2) address alleged *ex parte* concerns; and (3) prepare for the 2022 WMP. Each of these reasons is addressed below.

1. Approval of the 2021 WMP

The first reason that Cal Advocates puts forward for its discovery is so that it can review communications related to Energy Safety’s approval of the 2021 WMP.²⁸ This is similar to the statements made by Cal Advocates’ representatives in meet and confer, during which representatives expressed concern about Energy Safety’s decision to approve PG&E’s 2021 WMP and explained that Cal Advocates wanted to investigate any communications that may have impacted Energy Safety’s decision. As described above in Section I.A, Cal Advocates’ strongly opposed PG&E’s 2021 WMP and it disagreed with Energy Safety’s decision to approve it. Cal Advocates now wants to conduct discovery regarding that approval, including any related communications between PG&E and Energy Safety, to determine the validity of Energy Safety’s

²⁶ D.01-08-062, p. 7.

²⁷ The Cal Advocates’ requests are for communications since July 1, 2021. *See* Motion, Exhibit A. Since the requests were propounded September 30, 2021, presumably the time period covered by these requests is July 1, 2021 to September 30, 2021.

²⁸ Motion at pp. 1, 7.

actions. In essence, Cal Advocates appears to want to use discovery to exercise an oversight and monitoring role regarding Energy Safety's decision. Conducting oversight and monitoring the decisions of Energy Safety is certainly not within Cal Advocates' statutory goals nor is it an appropriate use of Cal Advocates' discovery authority. Energy Safety is a separate and co-equal agency created by the Legislature. Cal Advocates should not be conducting discovery to monitor and validate Energy Safety's decision.

Nor should Cal Advocates be using its statutory authority over PG&E as a way to get to information related to Energy Safety's decision making process. If Cal Advocates believes that this information is important to performing its duties, it could simply request the information from Energy Safety. However, Cal Advocates should not be able to use discovery requests propounded to PG&E or the other utilities to accomplish this purpose. Notably, it is unclear whether Cal Advocates even informed Energy Safety that it was submitting these discovery requests on September 30 or made any effort to discuss this matter with Energy Safety in advance of the discovery.

2. *Ex Parte* Concerns

The second reason for Cal Advocates request comes up later in its Motion. Cal Advocates implies that the requested information is necessary to address potential inappropriate communication that violate *ex parte* rules.²⁹ This argument is misplaced. Cal Advocates acknowledges that the Commission's General Counsel has unequivocally stated that *ex parte* rules do not apply to the Commission's approval process for the 2021 WMP.³⁰ Thus, it is unclear what potential *ex parte* violations Cal Advocates could be investigating if those rules do not apply. With regards to Energy Safety, Cal Advocates fails to point to any *ex parte* rules which have been adopted by and are applicable to Energy Safety, much less any potential *ex parte* violation.

²⁹ Motion at pp. 8-9, 12.

³⁰ Motion, Exhibit D.

There is one additional comment that bears mention here. PG&E does not dispute that improper *ex parte* communications at the CPUC occurred in the past. We regret that this happened and have learned from our mistakes. However, many of these communications occurred more than seven years ago, and in some cases more than a decade ago.³¹ Since that time, PG&E has terminated certain individuals involved in these communications, has instituted a comprehensive training and compliance program, and entered into a settlement with a number of parties, including Cal Advocates, to resolve past violations and implement remedies going forward.³² While not forgetting the past, we have implemented process and cultural changes so that it will not be repeated. Cal Advocates' efforts to harken back to a "troubling history of unauthorized communications"³³ simply ignores all that has occurred since that time, including remedies implemented consistent with a settlement that Cal Advocates was a party to.

3. Preparing for the 2022 WMP

Finally, at the end of its Motion, Cal Advocates pivots to a new argument as to the need for communications between Energy Safety and PG&E – the 2022 WMP.³⁴ Cal Advocates asserts that the time for it to review 2022 WMPs is limited and thus discovery is necessary. But this ignore the fact that the communications at issue in the request, between July 1, 2021 and September 30, 2021, are occurring well before the 2022 WMPs are submitted, which will not occur until February 2022. Moreover, Energy Safety has issued draft Guidelines for the 2022 WMPs and is currently requesting comments on these Guidelines.³⁵ Cal Advocates fails to explain how communications which occurred last summer impact the 2022 WMPs, which have not yet been submitted nor has Energy Safety's Guidance been made final.

³¹ D.18-08-014 at pp. 14-18.

³² See e.g. D.18-04-014.

³³ Motion at p. 9.

³⁴ Motion at pp. 11-13.

³⁵ Cal Advocates submitted its initial comments on the Guidelines with The Utility Reform Network and Mussey Grade Road Alliance on December 2, 2021.

C. PG&E Provided the Information Requested for Commissioners and/or their Staffs

Cal Advocates' Motion also appears to request that the Commission order PG&E to provide communications with Commissioners and/or their offices.³⁶ However, the scope of the requests related to Commissioners and/or their offices was narrowed in meet and confer and PG&E has fully complied with the data requests as narrowed, as explained above in Section I.D. Thus, this part of Cal Advocates' Motion is moot.

III. PG&E DID NOT ACT IN BAD FAITH

A. Cal Advocates' Claims of Bad Faith Are Misplaced

Cal Advocates requests monetary sanctions based on a claim that PG&E has acted in bad faith.³⁷ Cal Advocates' claims of faith are based on assertions concerning: (1) the substance of PG&E's objections; (2) PG&E's conduct during meet and confer; and (3) alleged obstructionist behavior to hinder Cal Advocates.³⁸ These assertions are flawed for three reasons.

First, PG&E objected to the discovery requests regarding communications with Energy Safety because Cal Advocates failed to explain the relevance of these requests to Cal Advocates statutory duties.³⁹ As explained above in Section II.A, Cal Advocates' discovery authority is not unlimited and requests intended to provide oversight or monitor a co-equal state agency are not within the scope of Cal Advocates' authority. Thus, PG&E's objections were entirely appropriate. Even if the Commission grants this motion and determines that Cal Advocates has the authority to seek the requested information, the fact that PG&E objected to these requests and provided a reasoned basis for doing so does not equate to bad faith. As Cal Advocates' counsel stated:

In no way [do] the Commission's rules indicate that it is not in good faith if after the meet and confer, the parties take a position that the other party is not amenable to.⁴⁰

³⁶ Motion at pp. 6-8.

³⁷ Motion at pp. 10-13.

³⁸ Motion at pp. 10-12.

³⁹ Motion, Exhibit K.

⁴⁰ Motion, Exhibit H.

Second, PG&E did not act in bad faith during the meet and confer process. As the timeline in Section I.C above makes clear, PG&E promptly responded to Cal Advocates' request for meet and confer, actively participated in the meet and confer process, during the process explained the basis for its objections, and ultimately agreed to change its position and produce materials related to communications with Commissioners and/or their staffs. The purpose of meet and confer is to try to resolve discovery disputes by parties compromising to reach a solution – exactly what occurred here. Although the parties were not able to resolve their dispute as to Energy Safety, they were able to resolve other aspects of the dispute about Cal Advocates' request and PG&E has subsequently provided materials responsive to this portion of Cal Advocates' requests. It bears repeating, as Cal Advocates' counsel stated, the fact that the parties were not able to resolve every issue in meet and confer does not mean that either party acted in bad faith.

Finally, Cal Advocates' claim about obstructionist behavior is unfounded. As a preliminary matter, it is helpful to take a step back and consider the volume of discovery propounded on PG&E related to the WMP as well as general non-case discovery requests. In the context of the 2021 WMP, Cal Advocates propounded 23 sets of data requests with more than 820 questions (counting subparts). PG&E provided hundreds of pages of responses and attachments to these requests. In addition, in 2021, Cal Advocates has propounded 20 non-case sets of discovery with more than 270 questions (counting subparts). Again, PG&E has produced hundreds of pages of responses and attachments to this non-case discovery. With this broader context in mind, PG&E's objections to 3 discovery requests out of over 1,000 WMP-related and non-case discovery requests (counting subparts) propounded in 2021 alone certainly cannot be considered evidence of obstructionist behavior. Cal Advocates' claims of obstructionist behavior are based on the 2022 WMP.⁴¹ However, as explained in Section II.B.3 above, the 2022 WMP will not be submitted until February 2022. Thus, it is unclear how PG&E's good faith objections to Cal Advocates' requests would constitute obstructionist behavior. To support its claim of

⁴¹ Motion at pp. 11-12.

obstructionist behavior, Cal Advocates also refers to *ex parte* issues.⁴² This issue is addressed above in Section II.B.2.

B. There Are Relevant Omissions In Cal Advocates' Motion

While it is clear that PG&E did not act in bad faith, there are several omissions in Cal Advocates' Motion that deserve mention. First, Cal Advocates' Motion appears to imply that PG&E did not respond to certain of the requests related to meetings with Commissioners and/or their offices in Questions 3 and 5.⁴³ In fact, Cal Advocates and PG&E agreed to limit the scope of Questions 3 and 5 with regard to communications with Commissioners and/or their offices.⁴⁴ As explained above in Section I.D, we have fully complied with this meet and confer agreement including responses on November 5, November 12, and December 3. The implication in the Motion that we have not fully complied with the agreed to scope of Questions 2, 3 and 5 with regard to Commissioners and/or their offices is simply wrong.

Second, Cal Advocates failed to include for the Commission a complete record of the meet and confer process. For example, PG&E's October 31st communication, which outlines our response to a number of Cal Advocates' positions, was notably not included in the 75 pages of exhibits provided by Cal Advocates.

Third, while the Motion includes Exhibit N, which was the follow-up to data request agreed to by PG&E and Cal Advocates, the Motion itself never addresses or explains Exhibit N. PG&E and Cal Advocates agreed to limit Cal Advocates' discovery with regard to Commissioners and their offices and also agreed that Cal Advocates could ask follow-up requests. This is exactly what happened – Exhibit N is Cal Advocates' follow-up request. However, the Motion never makes that clear, nor does Cal Advocates explain, that the parties agreed PG&E would respond by December 3, 2021, which PG&E subsequently did.

⁴² Motion at p. 12.

⁴³ Motion at p. 6 (indicating that the Motion includes Question 5 regarding communications with Commissioner offices).

⁴⁴ Motion, Exhibit K.

In short, Cal Advocates' Motion attempts to paint a picture of PG&E acting in bad faith, while leaving out certain key facts, such as the agreement between Cal Advocates and PG&E on some of the requests and PG&E's subsequent response providing the requested information.

IV. CONCLUSION

For the reasons explained above, PG&E respectfully requests that the Commission deny Cal Advocates' motion to compel and summarily dismiss its request for sanctions.

Respectfully Submitted,
CHARLES MIDDLEKAUFF

By: /s/ Charles Middlekauff
CHARLES MIDDLEKAUFF

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, California 94105
Telephone: (650) 766-9147
E-mail: Charles.Middlekauff@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: December 10, 2021

PACIFIC GAS AND ELECTRIC COMPANY
ATTACHMENT 1

Middlekauff, Charles (Law)

From: Middlekauff, Charles (Law)
Sent: Sunday, October 31, 2021 2:31 PM
To: Chen, Carolyn
Cc: Skinner, Nathaniel; Karle, Matthew; Wehrman, Alan; Olinek, Spencer; Middlekauff, Charles (Law)
Subject: RE: 10/29/2021 Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Carolyn:

We will let Cal Advocates know by Tuesday (11/2) at 5:00 p.m. (PST) whether PG&E agrees to the following proposal made by Cal Advocates (copied from the e-mail trail below)

1. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 3-5, for meetings you indicated PG&E would be willing to provide materials for, including
 - (a) PG&E's May 21, 2021 presentation to Wildfire Safety Division (before it transitioned to OEIS) referred to in OEIS's Draft Action Statement, and
 - (b) PG&E's October 8, 2021, meeting with Commissioner Guzman Aceves's Office regarding the Wildfire Mitigation Plan, as noticed in PG&E's October 5, 2021 notice sent to the R.18-10-007 service list.
2. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 1 and 2. After we receive answers to Questions 1-2, Cal Advocates will follow-up and request answers to Questions 3-5, based on the answers received for Questions 1-2.

***NOTE:**

For purposes of this set of data requests, a "meeting" or "presentation" includes phone, video, or in-person meetings, conferences, discussions, or presentations that are substantive in nature. By "substantive," we mean not "procedural matters" as defined in the Commission's Rules of Practice and Procedure, such as Rule 8.1(e), and regardless of whether such meeting or presentation was within or outside a formal Commission proceeding, and before the OEIS for those questions about meetings/presentations with OEIS.

In addition, your e-mail includes several statements that are incorrect or incomplete which I will briefly address:

1. As I explained in our call on Wednesday (10/27), it was my understanding that there were going to be conversations between Cal Advocates' leadership and the Office of Energy Infrastructure Safety (Energy Safety) leadership regarding the propriety of Cal Advocates' data requests. It is unclear from your response below whether those discussions have occurred or not. However, I understand from your statement below that regardless, Cal Advocates intends to pursue these requests.
2. Your statement that "PG&E indicated it was willing to provide partial data responses" on October 25 is incorrect. As I recall, during that conversation we explained our objections and requested that Cal Advocates make a proposal to modify its request given these objections. We did not agree to provide partial data requests. Rather, we agreed to consider Cal Advocates' proposal, which is exactly what we are doing.
3. Your characterization that we have "not articulated legitimate objections" is incorrect. During our meet and confer, we explained at length our objections to Cal Advocates' requests. From our perspective, Cal Advocates never adequately addressed these objections. However, as a matter of good faith and in order to

facilitate a positive working relationship with Cal Advocates, we agreed to consider your proposal to modify your requests.

4. Your characterization regarding “alleged confusion” is also incorrect. I did have questions regarding Cal Advocates’ proposal. When we talked on Wednesday (10/27), I explained that it did not make sense to further discuss these questions if Cal Advocates was going to be modifying or changing its proposal. I did not decline your offer for clarification. Instead, it was my understanding that we both agreed that it was unnecessary at that time to pursue further clarification given the outcome of the discussions described in Item 1 above. I am more than happy to explain my questions regarding Cal Advocates’ proposal above. In part (2), Cal Advocates’ indicates that after reviewing the response to Questions 1-2, it will “follow-up and request answers to Questions 3-5.” It is unclear from this statement: (1) whether Cal Advocates will prepare new discovery or simply indicate the follow-up items; and (2) whether by this statement Cal Advocates is implying that PG&E is waiving any right to object to any “follow-up” requests. The second item is especially important. It is unclear from Cal Advocates’ proposal whether the expectation is that by agreeing to this proposal, PG&E has waived the right to object to “follow-up” requests. Please clarify Cal Advocates’ proposal on this point.
5. During our call on October 25th, we did not dispute Cal Advocates’ statutory authority. However, Cal Advocates’ statutory authority is not unlimited and certainly does not automatically entitle Cal Advocates’ to seek discovery that is irrelevant or burdensome. We expressed objections regarding the relevance of these data requests, as well as the burden. Cal Advocates’ proposal above appears to be intended to address the burden issue that we raised. Cal Advocates has never adequately explained the relevance of its requests.
6. Finally, your statement about “lack of cooperation and stalling by PG&E” appears to be nothing more than rhetoric intended to be used in the motion to compel that you indicated you were prepared to file. Rather than stalling or lack of cooperation, we have been acting in good faith to try to resolve legitimate objections. Cal Advocates, on the other hand, has imposed unreasonable deadlines and has mischaracterized our statements and intent. We intend to continue to act in good faith in this matter, as we have been doing all along.

We will provide a response in writing on November 2 by 5:00 p.m. (PST).

Charles

From: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>

Sent: Friday, October 29, 2021 4:48 PM

To: Middlekauff, Charles (Law) <CRMd@pge.com>

Cc: Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>

Subject: 10/29/2021 Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Hi Charles,

I am writing to follow up on the status of Cal Advocates Data Request (DR) “CalAdvocates-PGE-NonCase-AWM-09302021A,” dated September 30, 2021. In our conversation on Wednesday, October 27, you indicated that you believed the Interim Director of Cal Advocates and Director of OEIS were going to be discussing the data requests, and that you believed that Cal Advocates’ DR should be put “in a holding pattern.” At this time, I have not received any indications that this meeting will impact Cal Advocates’ pending data request.

We previously met and conferred regarding this DR on Monday, October 25, 2021. At our meeting, PG&E indicated it was willing to provide partial data request responses. Cal Advocates agreed to consider what PG&E stated at the

meeting and later emailed at 4:32 p.m. that Cal Advocates would accept partial responses to its data request as a starting point. (See October 25, 4:32 email memorializing Cal Advocates' agreement.)

Therefore, I ask that you please let me know by next Tuesday, November 2, 2021, 5pm, whether PG&E will agree to provide at a minimum, the items listed in my email on October 25, at 4:32 p.m. by Monday, November 8, 2021.

Up to this point, you have not articulated legitimate objections to the data requests, nor have you provided any concrete information regarding your alleged confusion with our data requests, particularly regarding meetings with OEIS (Questions 1, and 3-5 for meetings with OEIS). Nevertheless, I have responded to all of your questions – multiple times, at our meet and confer on October 25, and in my subsequent communications with you. It is notable that in our October 27 phone conversation, I offered to clarify anything you wanted clarification on, and you declined. You also have not taken any opportunity to provide at least partial responses to Cal Advocates' data requests that you did not express any confusion on, including Question 2 regarding communications with the Commissioners' offices, and Questions 3-5 for meetings with the Commissioners' offices, as well as for the May 2021 meeting with OEIS that we discussed.

I also note that in our discussions on October 25, you acknowledged and were not confused about Cal Advocates' broad statutory authority to conduct discovery, yet continued to assert that PG&E is justified in not providing the responses to Cal Advocates' data requests.

Even given what appears to be a lack of cooperation and stalling by PG&E, I remain hopeful that we can resolve these data requests. Therefore, please confirm by Tuesday, November 2, that PG&E will provide by Monday, November 8, 2021, the items 1(a), 1(b), and 2 listed in the Monday, October 25, 4:32 p.m. email.

Thank you.

-Carolyn

From: Chen, Carolyn
Sent: Wednesday, October 27, 2021 12:28 PM
To: Middlekauff, Charles (Law) <CRMd@pge.com>
Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Charles,
Thanks so much. I called and left a voicemail. Unfortunately, I'm having delay issues with receiving voicemails so I have not been able to listen to your message yet. Hopefully soon or we'll talk soon.

-Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>
Sent: Wednesday, October 27, 2021 12:17 PM
To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>
Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Carolyn:

I left you a voice mail. Give me a call (650-766-9147) when you have a chance.

Thanks!

Charles

From: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>

Sent: Tuesday, October 26, 2021 10:25 AM

To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>

Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>

Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Charles,

I want to soften the deadline in my previous email of getting a response by end of day tomorrow (Wednesday, 5pm EST/2pm PST). We are amenable to setting up a meeting to talk no later than this week if we cannot get in touch today, and request PG&E provide their response to Cal Advocates 24 hours from the meeting. Many thanks. You are always welcome to call me too.

-Carolyn

From: Chen, Carolyn

Sent: Tuesday, October 26, 2021 9:40 AM

To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>

Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>

Subject: RE: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Charles:

Thank you for responding and your efforts to get clarity. I am available to talk today. Please feel free to call me at 818-357-7451. Also, may I suggest emailing your question(s) to us, which may help clarify anything you are unclear about and so we don't have to wait until you and I coordinate a call to hear what you need clarity about? While there is no set deadline in a proceeding we are working against, we do not want to delay this any further as it is important to the public. As we all agreed yesterday, the fact that PG&E's actions – for whatever reason -- got us to this meet and confer stage is unfortunate, given that that throughout this process PG&E has always had the ability to ask for clarity and communicate with us informally, sooner.

I am construing your email as an effort to see if you can agree to the proposal we presented by 11 a.m. today, and Cal Advocates will not file motions at this time. I can agree to give until end of business day tomorrow (Wednesday) on East Coast time (5pm EST/2pm PST) to give us your response. I want to remind you that we came out of yesterday's meeting with an understanding that both sides would be talking internally with our clients and coming up with and sharing any or further compromises. You have had the opportunity to talk further with your team after hearing Cal Advocates' position at our meet and confer. In good faith, Cal Advocates offered to consider what PG&E shared and proactively let you know before the end of day what, if anything, we had to share after the internal consultation. In no way does the Commission's rules indicate that it is not engaging in good faith if after the meet and confer, the parties take a position

that the other party is not amenable to. Cal Advocates has been engaging in good faith and I disagree with your characterization that our actions have been otherwise.

Anyways, thanks for communicating your concerns with me. And I look forward to getting a call/email from you!

-Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>

Sent: Monday, October 25, 2021 6:44 PM

To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>

Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>

Subject: [EXTERNAL] RE: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Carolyn:

Thank you for the response. As Spencer and I indicated today, we are both currently located on the east coast so this came in at 7:32 p.m. (EST). Spencer and I have not had a chance to talk, and we would like to discuss this issue with people internally as well. Given the time difference here, I will not be able to reach Spencer tonight (I have already tried) and we may be challenged meeting tomorrow morning given schedules. In addition, I have some questions regarding Cal Advocates' clarifications below, especially with regard to Questions 1 and 2.

The 11:00 a.m. (PST) deadline is not reasonable nor does it appear to be in good faith. See Rule 11.3(a). While we will definitely respond promptly after we have a chance to get clarification regarding Cal Advocates' proposal, providing PG&E less than 24 hours (especially when this e-mail was sent after hours on the east coast) does not seem reasonable.

Thus, I have two requests. First, I would like to talk further about the proposal below to understand what Cal Advocates is proposing. Second, once we receive further clarification, we would like 24 hours to make a decision. As you indicated today, there is not a proceeding pending that this information will be used for, nor to my knowledge is there a deadline that is upcoming for which Cal Advocates needs these materials (e.g., testimony, etc.). Thus, allowing us 24 hours to consider your proposal and respond, after receiving further clarification, seems entirely reasonable.

I look forward to your confirmation that you will not be filing a motion after 11:00 a.m. (PST) tomorrow and determining when you are available for a further call to clarify this request.

Charles

From: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>

Sent: Monday, October 25, 2021 4:32 PM

To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>

Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>

Subject: Follow-up to Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Charles,

Thank you and Spencer for meeting and conferring with us today regarding PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A).

Per our meeting today, at this time, Cal Advocates is willing to limit the data request CalAdvocates-PGE-NonCase-AWM-09302021A, to the following:

1. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 3-5, for meetings you indicated PG&E would be willing to provide materials for, including
 - (a) PG&E's May 21, 2021 presentation to Wildfire Safety Division (before it transitioned to OEIS) referred to in OEIS's Draft Action Statement, and
 - (b) PG&E's October 8, 2021, meeting with Commissioner Guzman Aceves's Office regarding the Wildfire Mitigation Plan, as noticed in PG&E's October 5, 2021 notice sent to the R.18-10-007 service list.
2. CalAdvocates-PGE-NonCase-AWM-09302021A Questions 1 and 2. After we receive answers to Questions 1-2, Cal Advocates will follow-up and request answers to Questions 3-5, based on the answers received for Questions 1-2.

***NOTE:**

For purposes of this set of data requests, a "meeting" or "presentation" includes phone, video, or in-person meetings, conferences, discussions, or presentations that are substantive in nature. By "substantive," we mean not "procedural matters" as defined in the Commission's Rules of Practice and Procedure, such as Rule 8.1(e), and regardless of whether such meeting or presentation was within or outside a formal Commission proceeding, and before the OEIS for those questions about meetings/presentations with OEIS.

Please let me know by 11 a.m. tomorrow Tuesday, October 26, whether PG&E will agree to provide these data requests above timely. If I do not hear an answer from you then, we will proceed with motions to compel and for sanctions. Thanks for your cooperation.

Sincerely,
Carolyn Chen

From: Chen, Carolyn

Sent: Friday, October 22, 2021 12:45 PM

To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <T8SF@pge.com>

Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>

Subject: RE: [EXTERNAL] RE: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

Wonderful. I'll send the meeting request for 11:00 a.m. soon. I'll block out an hour just in case we need it, but I don't expect it to take the full block of time. Thank you.

-Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>

Sent: Friday, October 22, 2021 12:02 PM

To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <T8SF@pge.com>

Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>

Subject: RE: [EXTERNAL] RE: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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11:00 a.m. works great for Monday (10/25).

If you can send a meeting invite, that would be great.

Have a good weekend.

From: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>

Sent: Friday, October 22, 2021 9:42 AM

To: Middlekauff, Charles (Law) <CRMd@pge.com>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <T8SF@pge.com>

Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>

Subject: RE: [EXTERNAL] RE: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Hi Charles,

Thank you so much for your quick response. 11 a.m. would work slightly better for our team, but if 10:30 a.m. is the only time you can meet, we can make it work. Can you let me know if 11 would work? If not, I'll proceed to set up a meeting for 10:30 a.m.

Many thanks,
Carolyn

From: Middlekauff, Charles (Law) <CRMd@pge.com>

Sent: Friday, October 22, 2021 6:36 AM

To: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>; Storer, Taylor <T8SF@pge.com>

Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>

Subject: [EXTERNAL] RE: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Carolyn:

Thank you for touching base and Spencer and I would be happy to discuss. Monday sounds great – how about 10:30 a.m. (PST)? I need to confirm with Spencer that he can move a meeting at that time, but if he can, that would work for me.

Does that work for the Cal Advocates team?

Charles

From: Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>
Sent: Thursday, October 21, 2021 2:58 PM
To: Olinek, Spencer <WSO3@pge.com>; Middlekauff, Charles (Law) <CRMd@pge.com>; Storer, Taylor <T8SF@pge.com>
Cc: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>; Karle, Matthew <matthew.karle@cpuc.ca.gov>; Skinner, Nathaniel <nathaniel.skinner@cpuc.ca.gov>
Subject: Meet & Confer re: PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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Hi Spencer and Charles,

Hope all is well. Can we have a meet and confer to discuss PG&E's responses in PG&E Non-Case Data Response CalAdvocates_077 and whether PG&E will reconsider its responses? I'm available tomorrow, Friday, 10/22, afternoon, and Monday, 10/25, late morning and afternoon. Please let me know what times during any of those windows you and/or the appropriate attendees are available.

Many thanks in advance for taking the time.

-Carolyn

Carolyn Chen (she/her)
Attorney, Legal Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298
Phone: (415) 703-1980
Email: carolyn.chen@cpuc.ca.gov

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From: Storer, Taylor <T8SF@pge.com>
Sent: Thursday, October 14, 2021 4:40 PM
To: Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>
Cc: Karle, Matthew <matthew.karle@cpuc.ca.gov>; Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Olinek, Spencer <WSO3@pge.com>; Middlekauff, Charles (Law) <CRMd@pge.com>
Subject: [EXTERNAL] PG&E Non-Case Data Response CalAdvocates_077 (CalAdvocates-PGE-NonCase-AWM-09302021A)

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All,

Please see attached PG&E's responses to Cal Advocates data request "**CalAdvocates-PGE-NonCase-AWM-09302021A**"; PG&E Non-Case Discovery, CalAdvocates_077, dated October 14, 2021.

For questions regarding this response, please send inquiries to Spencer Olinek (spencer.olinek@pge.com).

Taylor Storer

Pacific Gas and Electric Company
Case Coordinator | Regulatory Affairs
925.989.8397 | taylor.storer@pge.com

PACIFIC GAS AND ELECTRIC COMPANY
ATTACHMENT 2

Middlekauff, Charles (Law)

From: Olinek, Spencer
Sent: Friday, December 3, 2021 9:26 AM
To: Middlekauff, Charles (Law)
Subject: FW: [EXTERNAL] RE: Data Request CalAdvocates-PGE-NonCase-MK3-11192021

From: Karle, Matthew <matthew.karle@cpuc.ca.gov>
Sent: Wednesday, November 24, 2021 4:18 PM
To: Olinek, Spencer <WSO3@pge.com>; Middlekauff, Charles (Law) <CRMd@pge.com>; RegRelCPUCCases <RegRelCPUCCases@pge.com>
Cc: Burton, Henry <Henry.Burton@cpuc.ca.gov>; Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>
Subject: RE: [EXTERNAL] RE: Data Request CalAdvocates-PGE-NonCase-MK3-11192021

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Spencer,
Cal Advocates acknowledges receipt of this extension request.
-Matthew

From: Olinek, Spencer <WSO3@pge.com>
Sent: Friday, November 19, 2021 5:53 PM
To: Karle, Matthew <matthew.karle@cpuc.ca.gov>; Middlekauff, Charles (Law) <CRMd@pge.com>; RegRelCPUCCases <RegRelCPUCCases@pge.com>
Cc: Burton, Henry <Henry.Burton@cpuc.ca.gov>; Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>
Subject: [EXTERNAL] RE: Data Request CalAdvocates-PGE-NonCase-MK3-11192021

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Hi Matthew, receipt confirmed. Given the holiday week, we request until December 3 to complete.

Thank you.

Spencer

From: Karle, Matthew <matthew.karle@cpuc.ca.gov>
Sent: Friday, November 19, 2021 4:56 PM
To: Olinek, Spencer <WSO3@pge.com>; Alysa.Koo@pge.com; Middlekauff, Charles (Law) <CRMd@pge.com>; RegRelCPUCCases <RegRelCPUCCases@pge.com>
Cc: Burton, Henry <Henry.Burton@cpuc.ca.gov>; Chen, Carolyn <Carolyn.Chen@cpuc.ca.gov>; Wehrman, Alan <Alan.Wehrman@cpuc.ca.gov>
Subject: Data Request CalAdvocates-PGE-NonCase-MK3-11192021

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Please see attached data request CalAdvocates-PGE-NonCase-MK3-11192021, a follow-up to DR Cal Advocates-NonCase-AWM-09302021A. Responses are requested by November 24. Please contact us if clarification or additional time is needed, and please confirm receipt of this data request.

Matthew Karle
Senior Analyst, Wildfire Safety
Public Advocates Office
415 703 1850